

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE,

Defendant.

Case No. 18 Cr. 00204 (NGG) (VMS)

**NOTICE OF MOTION**

**Submitted on April 22, 2019**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated April 22, 2019, the Affidavit of Keith Raniere, dated April 21, 2019, the Declaration of Marc A. Agnifilo, dated April 22, 2019, and the exhibits appended to the Declaration and Affidavit, Defendant Keith Raniere through the undersigned attorney, Marc A. Agnifilo, will move the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, for an Order suppressing the images seized from device DSCV\_00000061, including the images the government alleges to be child pornography, and for such further relief as the Court may deem proper.

Dated: April 22, 2019  
New York, NY

Respectfully submitted,

/s/  
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Marc A. Agnifilo, Esq.  
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